

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNIQUE INDUSTRIES, INC. :
: Plaintiff, : 05 Civ. 02744 (KMK)
v. : : Filed Via ECF
SIU & SONS INT'L TRADING CORP. :
: Defendant. :
----- X

**DEFENDANT SIU & SONS' UNOPPOSED MOTION TO
EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant Siu & Sons International Trading Corp. ("Siu & Sons"), by its undersigned attorneys and in accordance with Fed. R. Civ. P. 6(b) and S.D.N.Y. L.Civ.R 6.1, hereby requests a thirty (30) day extension of time to answer or otherwise respond to the Complaint in this action. As grounds for this Motion, Siu & Sons states as follows:

1. Siu & Sons was served with the Complaint in this matter on March 30, 2005, so that an answer or other response to the Complaint was originally due on April 19, 2005.

2. A stipulation requesting thirty days within which to answer or otherwise respond to the Complaint was entered by the Court extending the original time to answer or otherwise respond to the Complaint to May 19, 2005.

3. Plaintiff Unique Industry Inc.'s counsel has advised Siu & Sons counsel that it does not object to an additional 30-day extension.

4. Good cause exists for an additional 30-day extension of time. The parties have been diligently working towards settling the case, and it appears that settlement is possible within the next 30 days.

A Proposed Order is attached to this motion for the Court's convenience.

Respectfully submitted,

Dated: May 19, 2005

s/ Gerard A. Haddad

Janet Dore (JD2992)

Gerard A. Haddad (GH2801)

Morgan & Finnegan, L.L.P.
3 World Financial Center
New York, NY 10281-2101
Telephone: (212) 415-8700
Facsimile: (212) 415-8701

Attorneys for Defendant
Siu & Sons International Trading Corp.

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[PROPOSED] ORDER

Defendant Siu & Sons Int'l Trading Corp.'s Unopposed Motion To Extend Time To Answer Or Otherwise Respond To Complaint is hereby granted. Defendant Siu & Sons Int'l Trading Corp.'s answer or other response to the complaint is due on or before June 20, 2005. No further extensions absent good cause.

So Ordered:

May __, 2005

Hon. Kenneth M. Karas
United States District Judge